



## OVERVIEW

GSA strives to exceed compliance with applicable executive orders and federal, state, and local environmental laws, standards, and guidelines to minimize any potential lead hazard in our inventory as it relates to our nation's children.

EPA regulates the management and disposal of lead wastes and has published guidelines for abatement. The Department of Housing and Urban Development (HUD) has also issued guidelines for testing and abatement of lead-based paint. The Occupational Safety and Health Administration (OSHA) regulates occupational exposure during abatement activities.

Exposure to lead damages human health. In adults, lead exposure can result in high blood pressure, nervous disorders, and memory problems. Lead exposure in children can result in kidney damage, stupor, coma, and severe brain damage. Children less than six years of age are at higher risk for exposure because they often play on the floor, where lead gathers.

Potential sources of lead exposure include lead-contaminated dust, soil, deteriorating paint chips, drinking water, and small arms ammunition. In the past, lead was added to many commercial products including paints, solder, plumbing, and ammunition. Lead is considered a risk factor in buildings built before 1978.

<b>GSA Responsibilities</b>	<ul style="list-style-type: none"> <li>■ Test for lead if project will disturb surface.</li> <li>■ Implement employee/child protection and exposure assessments.</li> <li>■ Abate lead paint as necessary.</li> </ul>
<b>Safety and Environmental Management Personnel Responsibilities</b>	<ul style="list-style-type: none"> <li>■ Ensure all painted surfaces in proposed or current childcare centers are tested for lead; or obtain certification that lead-free products were used in the construction and maintenance of the center.</li> </ul>
<b>Property Management Community Responsibilities</b>	<ul style="list-style-type: none"> <li>■ Test all painted surfaces for lead (unless "lead free" certification is obtained).</li> <li>■ Abate lead-based paint surfaces in childcare centers if lead hazard exists.</li> <li>■ Monitor abatement activities and notify abatement workers if lead dust exceeds standards.</li> <li>■ Dispose of lead-based paint waste properly.</li> </ul>

### Lead-Based Paint Regulations

Citation	Topic
40 CFR 261	Identification and Listing of Hazardous Waste*
40 CFR 262	Standards for Generators of Hazardous Waste*
40 CFR 745	Standards for lead based paint in pre-1978 child occupied facilities*

\*The entire text of the above regulations can be found at: <http://www.epa.gov/docs/epacfr40/chapt-1.info/chi-toc.htm>

### Further Information

- **PBS Environmental Hotline**  
(800) 379-6505 or e-mail [pbshotline@ene.com](mailto:pbshotline@ene.com)
- **GSA Home Page**  
<http://www.gsa.gov> - Search term "lead"
- **PBS Environmental Programs Home Page**  
(GSA intranet users only)  
<http://insite.gsa.gov/pbs/environmental>
- **National Lead Information Center**  
(800) 424-LEAD or <http://www.epa.gov/lead/nlic.htm>
- **National EPA Lead-Based Paint Program**  
<http://www.epa.gov/opptintr/lead/>
- **EPA Lead in the Environment**  
<http://www.epa.gov/seahome/leadenv.html>
- **EPA Regional Office Lead Coordinators**  
<http://www.epa.gov/opptintr/lead/leadoff1.htm>
- **EPA Lead Phase-out Technical Tips**  
<http://www.epa.gov/oia/tips/lead2.htm>
- **HUD Lead Paint Field Guide**  
<http://www.hud.gov/lea/LBPguide.pdf>
- **EPA Technical Review Workgroup - Lead in Children**  
<http://www.epa.gov/superfund/programs/lead/>

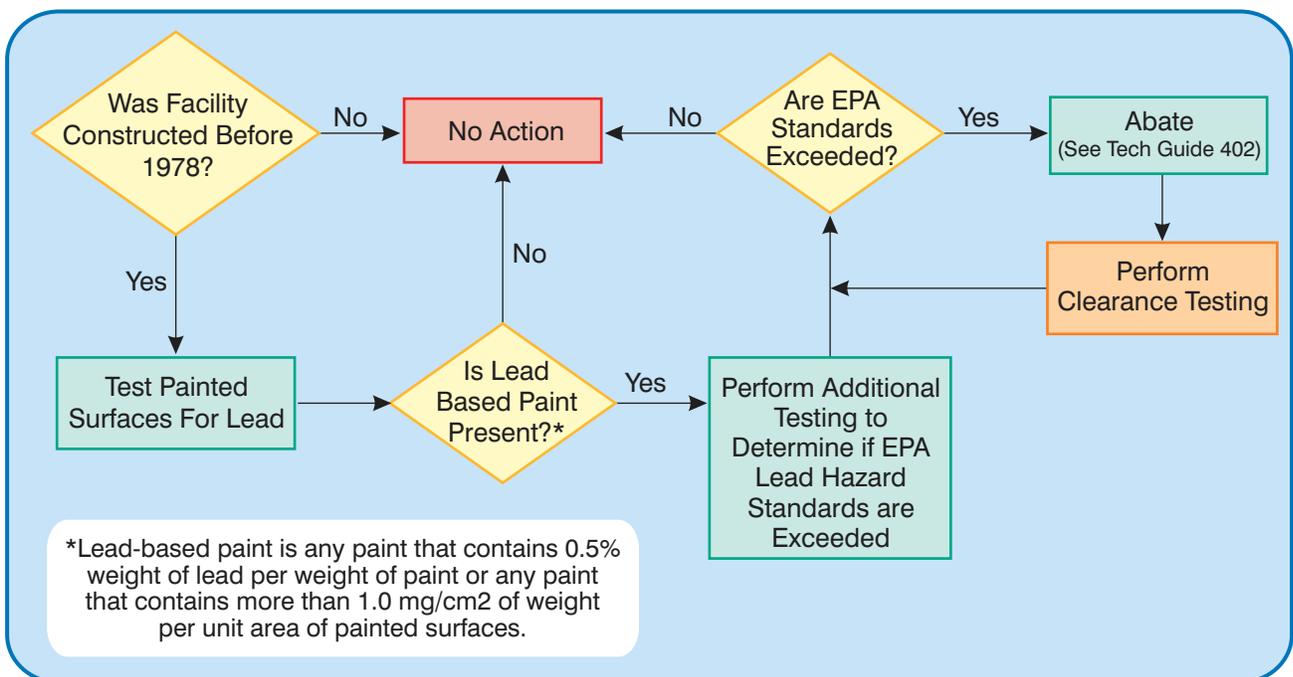
## GENERAL REQUIREMENTS

- Child care centers owned by GSA are subject to lead-based paint hazard reduction regulations issued by the Environmental Protection Agency (EPA) and Housing and Urban Development (HUD).
- Lead abatement activities are subject to Occupational Safety and Health Administration (OSHA) worker safety standards.
- Lead contaminated wastes are potentially hazardous and subject to RCRA hazardous waste management standards.

## TESTING REQUIREMENTS

- All painted surfaces in childcare centers located in buildings constructed before 1978 must be tested for lead.
- Testing may be performed by x-ray fluorescence analyzer or laboratory analysis.

## LEAD TESTING AND ABATEMENT DECISION LOGIC



### Lead Exposure Standards

EPA Lead Hazard Standards
<ul style="list-style-type: none"> <li>■ 40 g/ft<sup>2</sup> in dust on carpeted/bare floors</li> <li>■ 400 g/ft<sup>2</sup> in dust in window troughs</li> <li>■ 250 g/ft<sup>2</sup> in dust on window sills</li> <li>■ 400 mg/kg in bare soil in child play areas</li> <li>■ 1,200 mg/kg in bare soil in entire yard</li> </ul>

## NOTIFICATION REQUIREMENTS

- Building personnel and legal guardians are to be informed of the presence of lead in dust at concentrations greater than the standards and of all abatement activities.
- GSA must fully disclose all knowledge of lead-based paint in a building in the event of lease or sale of the property.